

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE BLOOMINGBURG JEWISH  
EDUCATION CENTER, INC. ET AL,  
Plaintiffs,

vs.

THE VILLAGE OF BLOOMINGBURG, ET  
AL,  
Defendants

Case No.: 14 –CV-07250-KBF

AFFIDAVIT OF TEEKARAM PERSAUD  
SUPPORTING MOTION TO QUASH NON-  
PARTY DISCOVERY SUBPOENAS

TEEKARAM (“TEEK”) PERSAUD, being first duly sworn, deposes and says:

1. I am a citizen of the United States and the State of New York, and a resident of Sullivan County.
2. I give this affidavit in support of the motion by Rural Community Coalition, Inc. (“RCC”), myself, Holly Roche and Anita Hoppe to quash subpoenas issued to us in the above captioned litigation. None of us are parties to this litigation, and all of us are located or reside and work in Sullivan County, several hours north of New York City.
3. I serve without compensation as the Treasurer of the RCC. I have received subpoenas addressed to me personally and to the RCC, copies of which are being filed with this motion. Those subpoenas would require my attendance in Manhattan for deposition. I do not believe I have any personal knowledge that any actions or

1 decisions of the Village of Bloomingburg or the Town of Mamakating have been  
2 motivated by anti-semitism or ethnic prejudice of any kind.

- 3 4. With my brother, I own and operate the Quickway Diner on Route 17K in  
4 Bloomingburg, New York, a business which requires regular on-premises  
5 management and supervision. For me to attend in Manhattan a deposition of  
6 indeterminate duration would be a substantial inconvenience to me and also an  
7 imposition on my brother who would have to cover my responsibilities in our  
8 business.  
9
- 10 5. RCC is a not-for-profit corporation, incorporated in October 2012, and located in  
11 Sullivan County, New York. It was created to preserve the rural heritage of the  
12 towns of Mamakating, Wallkill, and Crawford, and other surrounding communities,  
13 and to hold its elected officials accountable to adhere to the law and to respond  
14 ethically and proactively to the concerns of local residents. RCC declares, as its  
15 mission statement, that  
16  
17 “The RCC creates an environment that advocates for people to work  
18 cooperatively, communally and collectively; to hold its elected officials to the  
19 highest standards in accordance with the law; to work proactively for  
20 transparency and inclusivity in their governance; and to represent the will of the  
21 people who elected them with the goal of maintaining the character of the  
22 community in its growth.”  
23  
24
- 25 6. RCC was formed in response to information that a proposed housing development in  
26 or near Bloomingburg, previously described to us as consisting of 125 single family  
27 houses, each on its own two acre lot, in a gated community with a golf course,  
28

1 intended primarily for weekenders, would instead start with something totally  
2 different: nearly 400 units of high-density housing. We became concerned that our  
3 local officials had failed to adequately investigate the proposed development, or  
4 inform the citizens of our Village, and that there appeared to be irregularity, if not  
5 outright illegality, in the way this was being conducted.

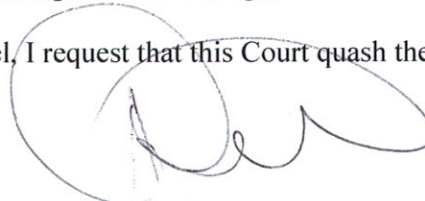
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- 7 7. Certainly, no kind of anti-ethnic sentiment played any role whatsoever in my  
8 participation in RCC, or, so far as I have observed, in that of any other RCC Board  
9 members, in our concern over imprudent high-density development in this rural and  
10 rustic corner of New York. Those active in the leadership of RCC are from many  
11 different ethnic and religious backgrounds. RCC's current President is herself  
12 Jewish.
- 13
- 14 8. RCC and its participants have, with volunteer labor and at great personal expense,  
15 made efforts to learn the truth about the proposed development, and to take what legal  
16 action was appropriate, to the extent we could afford to do so. Those efforts have led  
17 RCC to bring litigation challenging the Village's unauthorized annexation of land for  
18 the development, and led us to assist in exposing fraudulently registered voters whom  
19 the developer apparently recruited to rig our elections. We accumulated a  
20 tremendous amount of factual and legal research, boxes filled with copies of public  
21 records, obtained either by in person public records searches, or pursuant to the  
22 Freedom of Information Act or Freedom of Information Law requests. Copies of  
23 some of that material was furnished to the Federal Bureau of Investigation, which is  
24 apparently investigating some of these matters. (The newspapers in mid-March 2014  
25 reported an FBI "raid" of the developer's properties and the seizure of records.)  
26  
27  
28



9. Assembling, sorting and reproducing for production to the plaintiffs all of that material would be costly. Perhaps more important, it would unfairly give the developer insight, to which it should not be entitled, into the strategies and analyses of RCC and its participants and our counsel.

10. Finally, I know from personal observation that the service of these subpoenas has taken a toll among the RCC community. Some of our members are intimidated by the prospect of having to travel a great distance to answer questions for the lawyers of the developer who is threatening our community. It is and will be increasingly difficult to communicate among the participants and even the Board of the RCC if, as these subpoenas assert, everything we write or email will be subject to outside scrutiny and have to be turned over to a hostile adversary, with apparently limitless funds for lawyers, who is intent on taking over our Village.

11. For the reasons stated by our counsel, I request that this Court quash the subpoenas at issue.



Teekaram Persaud

Sworn to before me on March 19, 2015



NOTARY PUBLIC

